

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	Chapter 11
	§	
KRISJENN RANCH, LLC, et al	§	Case No. 20-50805
	§	
Debtor	§	(Jointly Administered)

**FIRST INTERIM APPLICATION FOR PAYMENT OF ATTORNEY’S FEES BY
THE SMEBERG LAW FIRM, PLLC, ATTORNEY FOR KRISJENN RANCH, LLC,
KRISJENN RANCH LLC, SERIES UVALDE RANCH, AND KRISJENN RANCH,
LLC, SERIES PIPELINE ROW, DEBTORS-IN-POSSESSION, FOR
PROFESSIONAL SERVICES RENDERED FROM
APRIL 27, 2020 THROUGH OCTOBER 31, 2021**

THIS APPLICATION REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. RESPONSES OR OBJECTIONS MUST BE IN WRITING AND FILED WITH THE COURT IN ORDER TO SEEK A HEARING ON THIS APPLICATION.

1. The Smeberg Law Firm, PLLC has applied for professional compensation in the amount of \$90,643.00 in fees and \$1,778.59 in administrative expenses for a total amount requested of \$92,421.59.

2. The time period covered is April 27, 2020, through October 31, 2021.

3. The movant is the attorney for KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”), the Debtors and Debtors-in-Possession.

4. This is the first interim application.

5. The movant has not previously received fees and expenses post-petition.

6. The movant received an original retainer of \$24,000.00, which was applied as follows:

- a. \$1,717.00 of the retainer was applied toward the case filing fee and \$18,283 was applied to prepetition fees leaving a balance of \$4,000.00 held in trust.

7. After the original retainer, Ronald Smeberg has received \$54,096.80 for work that he had completed or attorneys working for him had completed. The remaining amount due to the Smeberg Law Firm for work under this application is \$38,324.79.

8. The hourly rates charged for attorneys are \$325.00/hour for senior attorneys, \$250/hour for junior attorneys, and \$120/hour for paralegals and law clerks.

Dated: November 10, 2021

Respectfully Submitted,

THE SMEBERG LAW FIRM, PLLC.

By: /s/ Ronald J. Smeberg
RONALD J. SMEBERG
State Bar No. 24033967
4 Imperial Oaks
San Antonio, Texas 78248
(210) 695-6684, Telephone
(210) 598-7357, Facsimile
ron@smeberg.com
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the First Interim Application for Payment of Attorney's Fees by The Smeberg Law Firm, PLLC, Attorney for KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row, Debtors-in-Possession, was served by electronic mail through the Court's ECF system to all parties who have registered an appearance in this case and forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on November 10, 2021.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

**IN THE UNITED STATES BANKRUPTCY COURT
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Debtor	§	(Jointly Administered)

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THE SMEBERG LAW FIRM, PLLC, ATTORNEY FOR KRISJENN RANCH, LLC,
KRISJENN RANCH LLC, SERIES UVALDE RANCH, AND KRISJENN RANCH,
LLC, SERIES PIPELINE ROW, DEBTORS-IN-POSSESSION, FOR
PROFESSIONAL SERVICES RENDERED FROM
APRIL 27, 2020 THROUGH OCTOBER 31, 2021**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Now comes Ronald J. Smeberg of The Smeberg Law Firm, PLLC (“Applicant”), attorney for KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”), the Debtors and Debtors-in-Possession, pursuant to 11 U.S.C. §§ 503(b)(2), and 507(a)(1) as a priority administrative expense and states:

I. INTRODUCTION

Applicant seeks from the bankruptcy estate, payable as an administrative expense, professional fees of \$90,643.00 and \$1,778.59 in administrative expenses for a total amount requested of \$92,421.59 for the time-period April 27, 2020, through October 31, 2021 (“Compensation Period”).

II. BANKRUPTCY RULE 2016 REQUIREMENTS

1. Muller Smeberg, PLLC was appointed on April 27, 2020.
2. On November 18, 2020, Applicant submitted Notice of Change of Firm Name [Doc. No. 92] from Muller Smeberg, PLLC to The Smeberg Law Firm, PLLC.
3. On April 27, 2020, Debtors filed the Motion for Order Establishing Procedures for

Interim Compensation and Reimbursement of Professionals [Doc. No. 6] (the “Interim Fee Procedure Motion”), wherein the Debtors sought to establish a procedure for estate professionals to receive a monthly payment of 80% of fees and 100% of expenses. All professional services for which an allowance is requested were performed by Applicant for and on behalf of Debtors and not on behalf of any other person. This application seeks approval of fees of Applicant.

4. On May 21, 2020, the Court entered the Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals [Doc. No. 35] (the “Fee Procedure Order”), wherein the Court approved the payment of monthly fee procedures. Ronald Smeberg or the Smeberg Law Firm has received a total of \$54,096.80 for fees related to the Application with \$38,324.79 still remaining outstanding.

5. Applicant has not received any payment in addition to the pre-petition amounts shown above.

III. JOHNSON FACTORS ANALYSIS

Applicant requests compensation based on the factors set forth in 11 U.S.C. §§ 330(a)(3) and *Johnson v. Georgia Highway Express, Inc.* 488 F.2d 714, 717-19 (5th Cir. 1974). These factors include the following:

1. Time and Labor Required. A description of the time and labor sorted by category of activity of Applicant appears in Exhibit A.

2. The Skill Required to Perform the Legal Services Provided. It is necessary that the Debtors’ attorney be well versed with the Debtors’ situation to efficiently represent them. Attorney Ronald Smeberg has successfully prosecuted numerous small business chapter 11 bankruptcies and has the necessary skills to provide the services needed in this case.

3. The Preclusion of Other Employment by the Attorney Due to Acceptance of the

Case. Applicant has not turned down any specific cases as a result of undertaking this representation.

4. The Customary Fee. The compensation sought herein is comparable to the fees charged by other attorneys of comparable experience.

5. Whether the Fee is Fixed or Contingent. The fee is fixed at \$325.00 per hour for senior attorneys, \$250.00 per hour for junior attorneys, and \$120.00 per hour for paralegals and law clerks. This case was not taken on a contingent basis.

6. Time Limitations by the Client or Other Circumstances. Not applicable.

7. The Experience, Reputation and Ability of the Attorneys. Applicant's primary attorney working on this case has been Ronald J. Smeberg. Debtors have selected Ronald J. Smeberg because of his experience and knowledge in the field of Debtors' rights under the United States Bankruptcy Code and his representation of the Debtors prior to the filing of his Chapter 11 petition. During the Course of preparing for Debtors' Chapter 11 case, Mr. Smeberg has prepared the initial pleadings on behalf of the Debtors, has gained experience as to the Debtors' property, and has become familiar with many of the pertinent legal issues which may arise in the context of the Debtors' Chapter 11 case.

8. The "Undesirability" of the Case. The case is not undesirable.

9. Nature and Length of the Professional Relationship with the Client. Muller Smeberg, PLLC was retained by Debtors for representation on March 11, 2020. Notice of Change of Firm Name was filed with the Court on November 18, 2020 [Doc. No. 92].

10. Results Obtained. The Smeberg Law Firm, PLLC has participated in assisting the Debtors with administration of the estate including preparing schedules, preparing and prosecuting first day motions, reviewing Monthly Operating Reports, assisting Debtor with

analyzing and correcting financials, negotiating with creditors, negotiating with the United States Trustee, prosecuting motions to employ professionals, representing Debtor at various hearings, and drafting Debtor's plan of reorganization.

11. Awards in Similar Case. Applicant believes that the amount requested is similar or less than what other attorneys of similar experience would charge in similar cases.

12. Travel Time. Billing for travel time is minimal compared to services rendered.

13. Other Factors. There are no other factors of particular importance to the fee request.

IV. PRAYER

Wherefore, pursuant to 11 U.S.C. §§ 303(a)(1) and 331, the Applicant respectfully requests the approval of the first interim fee application of The Smeberg Law Firm, PLLC for payment of professional fees of \$90,643.00 and payment of administrative fees of \$1,778.59 for a total administrative expense claim under 11 U.S.C. §§ 503(a) of \$92,421.59 and for all other relief to which the Applicant shows itself justly entitled.

Dated: November 10, 2021

Respectfully Submitted,

THE SMEBERG LAW FIRM, PLLC.

By: /s/ Ronald J. Smeberg
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State Bar No. 24033967
4 Imperial Oaks
San Antonio, Texas 78248
(210) 695-6684, Telephone
(210) 598-7357, Facsimile
ron@smeberg.com
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the First Interim Application for Payment of Attorney's Fees by The Smeberg Law Firm, PLLC, Attorney for KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row, Debtors-in-Possession, was served by electronic mail through the Court's ECF system to all parties who have registered an appearance in this case and forwarded to all parties listed on the attached Service List, by first class mail, postage prepaid, on November 10, 2021.

/s/ Ronald J. Smeberg

RONALD J. SMEBERG

EXHIBIT A

Chapter 11 Bankruptcy

GENERAL, MISCELLANEOUS LEGAL SERVICES FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
4/27/2020	Craig O'Neil	Letter to Opposing counsel regarding proper filing.	1	\$250.00	\$250.00
4/27/2020	Craig O'Neil	Review version 2 and version 3 of letter to opposing counsel regarding proper filing.	0.3	\$250.00	\$75.00
4/27/2020	Craig O'Neil	Review emails from opposing counsel.	0.3	\$250.00	\$75.00
4/27/2020	Craig O'Neil	Review legal bills for Black Duck from Boerner, Douglas, & Franklin, and George Pigg.	0.4	\$250.00	\$100.00
4/27/2020	Denielle Anguiano	Final revisions to first day motions; confer with R. Smeberg; prepare envelopes for mail out; calendar of all hearings.	1.2	\$120.00	\$144.00
4/27/2020	Denielle Anguiano	Prepare Notice of Bankruptcy Filings for Panola & Shelby County cases; file.	0.5	\$120.00	\$60.00
4/27/2020	Denielle Anguiano	Conduct search in South Carolina SOS for registered agent in DMA properties; send to C. O'Neil.	0.2	\$120.00	\$24.00
4/27/2020	Denielle Anguiano	Email all parties of interest file stamped pleadings; Mail out of first day motions; take to post office.	1.7	\$120.00	\$204.00
4/27/2020	Denielle Anguiano	Draft notice of hearings; confer with R. Smeberg; file and add to bulk mail out.	0.8	\$120.00	\$96.00
4/27/2020	Denielle Anguiano	Finalize of categorizing client documents.	1.5	\$120.00	\$180.00
4/27/2020	Paige Burough	Confer w R. Smeberg; Prepare notices of bankruptcy filing for state court in Longbranch and Bigfoot cases.	1.1	\$120.00	\$132.00
4/27/2020	Ronald Smeberg	Finalize cash collateral, motion to employ, motion regarding payment of professionals, motion to incur debt, both motions to expedite and all orders; file motions with the Court.	2.2	\$325.00	\$715.00
4/27/2020	Ronald Smeberg	Conference with law clerk regarding notice of bankruptcy filings; review notices and give staff directions regarding changes.	0.3	\$325.00	\$97.50
4/28/2020	Denielle Anguiano	Prepare 2004 letters for Certified Mailing; minor revisions to cover letter and take to post office.	0.8	\$120.00	\$96.00
4/28/2020	Denielle Anguiano	Confer with R. Smeberg regarding new filing; open case and copy case information.	0.5	\$120.00	\$60.00
4/28/2020	Ronald Smeberg	Review hundreds of emails for privilege and disclosure.	2.4	\$325.00	\$780.00
4/28/2020	Ronald Smeberg	Research series LLC filing issues.	1.2	\$325.00	\$390.00
4/28/2020	Ronald Smeberg	Research substantive consolidation and series in bankruptcy.	0.7	\$325.00	\$227.50
4/28/2020	Ronald Smeberg	Numerous conferences with Larry Wright; conferences with David Strolle; conferences with John Muller; conference with Tim Cleveland and Andy Seger;	3.5	\$325.00	\$1,137.50

		conference with Laura Worsham; conference with Michael Black.			
4/28/2020	Ronald Smeberg	Email Tim Cleveland; email exchange with UST; email John Muller.	0.4	\$325.00	\$130.00
4/28/2020	Ronald Smeberg	Conference with Michael Black.	0.3	\$325.00	\$97.50
4/29/2020	Craig O'Neil	Case law research on the doctrine of substantive consolidation.	2	\$250.00	\$500.00
4/29/2020	Craig O'Neil	Discuss substantive consolidation law with R. Smeberg.	0.3	\$250.00	\$75.00
4/29/2020	Craig O'Neil	Assign D. Anguiano task to pull documents from Pacer regarding substantive consolidation.	0.1	\$250.00	\$25.00
4/29/2020	Denielle Anguiano	Scan and save client documents; file declaration of electronic filing and amend certificate of service with recent notice parties.	0.5	\$120.00	\$60.00
4/29/2020	Denielle Anguiano	Confer with C. O'Neil regarding case law; review docket of case No. 18-12442; download docket and pleading and send to counsel.	0.5	\$120.00	\$60.00
4/29/2020	Ronald Smeberg	Meet with Larry Wright; prepare for hearing; conference with Tim Cleveland; attend hearing by phone.	1.3	\$325.00	\$422.50
4/30/2020	Denielle Anguiano	Download electronic schedules; File amended A/B and Edec.	0.3	\$120.00	\$36.00
4/30/2020	Denielle Anguiano	Attention to Black Duck formation documents left by client. Scan, rename and save.	1.2	\$120.00	\$144.00
4/30/2020	Ronald Smeberg	Research running with the land; privity with the land; and parole evidence rule.	1.4	\$325.00	\$455.00
5/1/2020	Craig O'Neil	Continue research and analysis of substantive consolidation with our facts.	2	\$250.00	\$500.00
5/1/2020	Craig O'Neil	Research on Texas Business Organizations Code and its interplay with Series LLC filing bankruptcy.	1.5	\$250.00	\$375.00
5/1/2020	Ronald Smeberg	Conference with Michael Black; detailed email to parties regarding settlement. Download summons and send staff instructions on service.	0.7	\$325.00	\$227.50
5/2/2020	Craig O'Neil	Draft Motion seeking substantive Consolidation.	2.3	\$250.00	\$575.00
5/2/2020	Craig O'Neil	Discuss EFT option with D. Anguiano and respond to Eric on signatures.	0.2	\$250.00	\$50.00
5/4/2020	Ronald Smeberg	Conference with Larry Wright; conference with Michael Black.	0.2	\$325.00	\$65.00
5/10/2020	Craig O'Neil	Review final version of response to motion split or dismiss and discuss evidence with R. Smeberg.	0.4	\$250.00	\$100.00
5/10/2020	Craig O'Neil	Review emails between R. Smeberg and client.	0.1	\$250.00	\$25.00
5/10/2020	Craig O'Neil	Review case law in response to motion to dismiss with R. Smeberg.	0.1	\$250.00	\$25.00
5/11/2020	Craig O'Neil	Edit latest version of Response to Motion to Dismiss or Split.	0.4	\$250.00	\$100.00
5/12/2020	Denielle Anguiano	Prepare for mail out of response and take to the post office.	0.8	\$120.00	\$96.00

5/12/2020	Ronald Smeberg	Draft detailed hearing email to client; draft detailed email to staff on exhibits and witnesses; email Michael Black.	0.5	\$325.00	\$162.50
5/12/2020	Ronald Smeberg	Conference with Michael Black; conference with staff regarding response.	0.3	\$325.00	\$97.50
5/13/2020	Ronald Smeberg	Conference with John Roberts regarding potential capital partners; email James Keith.	0.3	\$325.00	\$97.50
5/15/2020	Denielle Anguiano	Follow up on email to Michael Black requesting exhibit list for 5/21 hearing; confer with R. Smeberg regarding the same; review of client documents for useful exhibits.	0.6	\$120.00	\$72.00
5/15/2020	Denielle Anguiano	Draft of exhibit list; confer with C. O'Neil regarding the same.	0.3	\$120.00	\$36.00
5/15/2020	Ronald Smeberg	Conference with James Keith.	0.5	\$325.00	\$162.50
5/15/2020	Ronald Smeberg	Larry Wright and Michael Black conferences.	0.5	\$325.00	\$162.50
5/16/2020	Denielle Anguiano	Scan and manage client documents for 5/21 hearing; revisions to exhibit list and finalize exhibits.	1.7	\$120.00	\$204.00
5/16/2020	Denielle Anguiano	Prepare amended filings for mail out.	0.6	\$120.00	\$72.00
5/16/2020	Ronald Smeberg	Work on exhibits and list for hearing.	0.4	\$325.00	\$130.00
5/16/2020	Ronald Smeberg	Conference with Michael Black on exhibits. Conference with staff on adding tax return as exhibit. Email parties on exhibits.	0.4	\$325.00	\$130.00
5/18/2020	Craig O'Neil	Discuss Single entity bankruptcy filing argument with R. Smeberg in preparation for May 21 hearing.	0.3	\$250.00	\$75.00
5/18/2020	Craig O'Neil	Review articles to be sent to the court, make appropriate highlights, and send articles to R. Smeberg re: Series LLC's filing bankruptcy.	0.4	\$250.00	\$100.00
5/18/2020	Denielle Anguiano	Email to Bankruptcy Clerk regarding exhibits.	0.2	\$120.00	\$24.00
5/18/2020	Denielle Anguiano	Review; file and save emails as PDFs. Confer with R. Smeberg regarding task for 5/21 hearing. Begin prep for exhibit binders.	1	\$120.00	\$120.00
5/18/2020	Ronald Smeberg	Conference with Craig O'Neil regarding dismissal motion issues; conference with Larry Wight; review exhibit and witness list from opposing party. Begin preparing for hearing.	0.5	\$325.00	\$162.50
5/19/2020	Craig O'Neil	Discuss opening and closing arguments to be drafted for R. Smeberg.	0.2	\$250.00	\$50.00
5/19/2020	Craig O'Neil	Review and highlight McIlheney Article on Series LLC filing bankruptcy.	1	\$250.00	\$250.00
5/19/2020	Craig O'Neil	Begin draft opening arguments for hearing on motion to dismiss.	1	\$250.00	\$250.00
5/19/2020	Denielle Anguiano	Search for notice of bankruptcy filing in state case; email to R. Smeberg; Request of case summary of Cause No. 2019-355.	0.5	\$120.00	\$60.00
5/19/2020	Denielle Anguiano	Make exhibit binders for court and R. Smeberg; make binder from opposing counsel. Confer with R. Smeberg regarding added articles; add certificate of service to exhibit list and file.	2.6	\$120.00	\$312.00

5/19/2020	Ronald Smeberg	Conference with staff on exhibits.	0.2	\$325.00	\$65.00
5/20/2020	Craig O'Neil	Work on opening argument for 5/21 hearing.	1.3	\$250.00	\$325.00
5/20/2020	Craig O'Neil	Work on opening and closing arguments for 5/21 hearing with R. Smeberg.	2	\$250.00	\$500.00
5/20/2020	Craig O'Neil	Attention to version 3 of opening argument for 5/21 hearing and sending to R. Smeberg.	1	\$250.00	\$250.00
5/20/2020	Denielle Anguiano	Confer with R. Smeberg regarding statutes; download, format and email to Clerk's Office; Finalize Exhibit binders for 5/21 hearing; deliver to Clerk's Office. Prepare opposing counsel's binder.	2.7	\$120.00	\$324.00
5/20/2020	Ronald Smeberg	Conference with Craig O'Neil on motion; email court deputy regarding case issues.	0.3	\$325.00	\$97.50
5/20/2020	Ronald Smeberg	Research legislative history on Texas Series.	0.5	\$325.00	\$162.50
5/20/2020	Ronald Smeberg	Numerous conferences with Craig O'Neil on preparing opening and closing arguments.	0.7	\$325.00	\$227.50
5/20/2020	Ronald Smeberg	Review and revise opening and closing arguments.	1.5	\$325.00	\$487.50
5/20/2020	Ronald Smeberg	Draft questions for Larry Wright and review exhibits.	2.3	\$325.00	\$747.50
5/21/2020	Denielle Anguiano	Assist with preparation for 5/21 hearing; review summons and certificate of service; combine and send to R. Smeberg for review.	0.8	\$120.00	\$96.00
5/21/2020	Ronald Smeberg	Prepare for hearing with client on motion to sever; attend hearing on motion to sever.	3.5	\$325.00	\$1,137.50
5/22/2020	Craig O'Neil	Review emails regarding hearing and part of hearing transcript.	0.3	\$250.00	\$75.00
5/22/2020	Denielle Anguiano	Scan and file amended Transcript Order.	0.2	\$120.00	\$24.00
5/22/2020	Ronald Smeberg	Conferences with Michael Black; conferences with Court clerk and Deputy.	0.5	\$325.00	\$162.50
5/22/2020	Ronald Smeberg	Review UST order on Joint Administration and respond to email.	0.2	\$325.00	\$65.00
5/26/2020	Denise Saathoff	Transcribe audio from 5/21 hearing.	1.2	\$120.00	\$144.00
5/26/2020	Ronald Smeberg	Download Black Duck files from Counsel; Email and text message client.	0.2	\$325.00	\$65.00
5/26/2020	Ronald Smeberg	Review and revise order on motion to sever; email parties.	0.2	\$325.00	\$65.00
5/27/2020	Ronald Smeberg	Client conference.	1.1	\$325.00	\$357.50
5/28/2020	Ronald Smeberg	Client conference; conference with Laura Worsham.	0.5	\$325.00	\$162.50
5/31/2020	Denise Saathoff	Attention to notes taken from 5/21 hearing.	2.5	\$120.00	\$300.00
6/1/2020	Denielle Anguiano	Phone call with Exceptional Reporting regarding payment of transcript; email and additional phone calls with R. Smeberg regarding the same.	0.2	\$120.00	\$24.00
6/1/2020	Denise Saathoff	Transcribe audio from 5/21 hearing	2.8	\$120.00	\$336.00
6/1/2020	Ronald Smeberg	Review text message from client; email parties; conference Michael Black; second email to parties.	0.2	\$325.00	\$65.00
6/2/2020	Denielle Anguiano	Review and save emails as PDFs	0.3	\$120.00	\$36.00
6/3/2020	Ronald Smeberg	Review letter from Don Dennis; email defense counsels; conference with client.	0.5	\$325.00	\$162.50

6/4/2020	Denise Saathoff	Transcribe Audio	3	\$120.00	\$360.00
6/4/2020	Ronald Smeberg	Review related business filings on secretary of state website; revise schedules.	0.5	\$325.00	\$162.50
6/4/2020	Ronald Smeberg	Respond to Segar emails.	0.4	\$325.00	\$130.00
6/9/2020	Denielle Anguiano	Prepare mail out of Doc. 52	0.5	\$120.00	\$60.00
6/10/2020	Denielle Anguiano	Work on May invoice; send to R. Smeberg.	1	\$120.00	\$120.00
6/16/2020	Denielle Anguiano	Arrange for counsel and client meeting; send confirmation email.	0.2	\$120.00	\$24.00
6/17/2020	Denise Saathoff	Prepare for in person meeting at A. Tiwari's office.	1.5	\$120.00	\$180.00
6/22/2020	Denielle Anguiano	Review docket; file and mail out motion to extend time.	0.5	\$120.00	\$60.00
6/22/2020	Denielle Anguiano	Emails to J. Muller, R. Smeberg and debtor to arrange for meeting. Text to A. Tiwari regarding the same.	0.2	\$120.00	\$24.00
6/24/2020	Denielle Anguiano	Arrange for client meeting; send out video conference link.	0.3	\$120.00	\$36.00
6/24/2020	Ezekiel Perez	Review correspondence from client and R. Smeberg; confer with C. O'Neil regarding finalize draft and filing.	0.2	\$250.00	\$50.00
6/25/2020	Denielle Anguiano	Briefly host call and attempt to reconnect.	0.2	\$120.00	\$24.00
6/25/2020	Ronald Smeberg	Client Conference	1	\$325.00	\$325.00
6/26/2020	Ronald Smeberg	Conferences with Larry Wright, Laura Worsham, and Jeffrey Duke.	0.8	\$325.00	\$260.00
6/30/2020	Denielle Anguiano	Review of docket for Edec. filings.	0.3	\$120.00	\$36.00
7/1/2020	Ronald Smeberg	Conference with Mcleod counsel; conference with court clerk on dates; revise cash collateral order and upload; email Mcleod counsel.	0.6	\$325.00	\$195.00
7/3/2020	Craig O'Neil	Discuss answer deadline and extension of time due to holiday with R. Smeberg. Research holiday effect on answer deadline.	0.2	\$250.00	\$50.00
7/3/2020	Denielle Anguiano	Review of docket and email to debtor regarding the same. File Edec...	0.5	\$120.00	\$60.00
7/6/2020	Ronald Smeberg	Larry Wright and then J. Muller & Larry Wright conference call.	0.6	\$325.00	\$195.00
7/10/2020	Denielle Anguiano	Review all time entries and compile for June invoice.	0.5	\$120.00	\$60.00
7/10/2020	Ronald Smeberg	In person conference with Larry Wright; Phone conference with McCleod attorney; conference with Larry Wright.	2.4	\$325.00	\$780.00
7/13/2020	Denielle Anguiano	Review jointly administered bankruptcy dockets; scan and file E-Decs.	0.7	\$120.00	\$84.00
7/13/2020	Ronald Smeberg	Conferences with John Muller; Conferences with Larry Wright; Conferences with Michael Black; Send email to Tim Cleveland.	0.7	\$325.00	\$227.50
7/13/2020	Ronald Smeberg	Conference with Larry Wright; email opposing counsel; email Debtor's accountant.	0.5	\$325.00	\$162.50
7/13/2020	Ronald Smeberg	Conferences with counsel for McCleod Oil.	1	\$325.00	\$325.00
7/16/2020	Denielle Anguiano	Email to counsel of amended motion doc. 23.	0.2	\$120.00	\$24.00

7/16/2020	Ronald Smeberg	Conference with Larry Wright; conference with John Muller; Conference with Mcleod Counsel.	0.8	\$325.00	\$260.00
7/23/2020	Ronald Smeberg	Larry Wright Conference; William Germany Conference; Zeke Perez conference.	0.3	\$325.00	\$97.50
7/28/2020	Ronald Smeberg	Client Meeting	0.5	\$325.00	\$162.50
8/3/2020	Ronald Smeberg	Conference with Zeke Perez regarding hearing	0.2	\$325.00	\$65.00
8/3/2020	Ronald Smeberg	Conferences with Larry Wright individually; conference with John Muller and Larry Wright; Conference with Jeff Duke; Conference with Michael Black regarding hearing.	0.3	\$325.00	\$97.50
8/5/2020	Denielle Anguiano	Draft and send to R. Smeberg motion for expedite; follow up call.	0.5	\$120.00	\$60.00
8/6/2020	Denielle Anguiano	Revisions to order on motion to expedite;	0.4	\$120.00	\$48.00
8/6/2020	Denielle Anguiano	File motion to extend exclusivity and motion to expedite; email to court clerk regarding setting of hearing.	0.4	\$120.00	\$48.00
8/6/2020	Ronald Smeberg	Conference with Bill Kulman and Email to Jeff Duke.	0.3	\$325.00	\$97.50
8/6/2020	Ronald Smeberg	Larry Wright conference.	0.2	\$325.00	\$65.00
8/10/2020	Denielle Anguiano	Compile and review July invoice; send to R. Smeberg for review.	0.9	\$120.00	\$108.00
8/12/2020	Ronald Smeberg	Conference with Larry Wright.	0.5	\$325.00	\$162.50
8/17/2020	Ronald Smeberg	Prepare for and attend exclusivity hearing.	0.3	\$325.00	\$97.50
8/19/2020	Ronald Smeberg	Conference with Debtor;	0.2	\$325.00	\$65.00
8/19/2020	Ronald Smeberg	Conference with Larry Wright.	0.2	\$325.00	\$65.00
8/20/2020	Ronald Smeberg	Larry Wright and J. Muller conference	0.7	\$325.00	\$227.50
8/20/2020	Ronald Smeberg	J. Muller follow up conference	0.2	\$325.00	\$65.00
8/20/2020	Ronald Smeberg	Conference with McCloud counsel regarding settlement.	0.1	\$325.00	\$32.50
8/27/2020	Ronald Smeberg	Conference with John Muller regarding conference with Mcleod counsel.	0.3	\$325.00	\$97.50
9/7/2020	Ronald Smeberg	Work on new Longbranch Settlement Agreement.	1.5	\$325.00	\$487.50
9/8/2020	Ronald Smeberg	Work on new Longbranch Settlement Agreement and Email to Jeff Duke.	1.3	\$325.00	\$422.50
9/9/2020	Craig O'Neil	Discuss Longbranch settlement issues with R. Smeberg.	0.1	\$250.00	\$25.00
9/9/2020	Ronald Smeberg	Conference with Attorney for TCRG.	0.2	\$325.00	\$65.00
9/9/2020	Ronald Smeberg	Email Natalie Wilson regarding pipeline issue.	0.2	\$325.00	\$65.00
9/10/2020	Denielle Anguiano	Review and prepare August bill for submission.	0.7	\$120.00	\$84.00
9/10/2020	Denielle Anguiano	Scan emails and send to R. Smeberg.	0.1	\$120.00	\$12.00
9/14/2020	Denielle Anguiano	Phone call to debtor to request office visit to sign documents.	0.1	\$120.00	\$12.00
9/25/2020	Denielle Anguiano	Review and update of internal billing.	1.5	\$120.00	\$180.00
10/10/2020	Denielle Anguiano	Review and revise all September time entries. Prepare invoice.	0.6	\$120.00	\$72.00
11/2/2020	Denielle Anguiano	Prepare notice of hearing and file with Court	0.5	\$120.00	\$60.00

11/3/2020	Denielle Anguiano	Draft notice of withdrawal; review with Z. Perez and file	1	\$120.00	\$120.00
11/4/2020	Paige Burough	Prepare Second Motion to Extend Exclusivity with Proposed Order and Motion to Expedite with Proposed Order	1.6	\$225.00	\$360.00
11/5/2020	Denielle Anguiano	Prepare notice of expedited hearing and file with the Court; and mailout.	1	\$120.00	\$120.00
11/5/2020	Denielle Anguiano	File motion for expedited consideration and motion to extend exclusivity; prepare for mailout and take to post office.	1	\$120.00	\$120.00
11/5/2020	Paige Burough	Prepare Motion to Substitute Counsel with Proposed order	0.8	\$225.00	\$180.00
11/5/2020	Paige Burough	Prepare motion and order to extend exclusivity period	0.8	\$225.00	\$180.00
11/6/2020	Paige Burough	Prepare motion and order to substitute counsel	0.3	\$225.00	\$67.50
11/9/2020	Paige Burough	Revise motion and order to substitute counsel to include notice of address	0.3	\$225.00	\$67.50
11/12/2020	Denielle Anguiano	Review and combine all time for October invoice	0.6	\$120.00	\$72.00
11/18/2020	Denielle Anguiano	Convert to PDF and file Notice of change of firm name	0.3	\$120.00	\$36.00
11/18/2020	Paige Burough	Convert motion to substitute counsel to notice of change of firm address	0.2	\$225.00	\$45.00
11/25/2020	Ronald Smeberg	Review option agreement and proposed modification; redline modifications; send two emails to Mcleod counsel regarding modifications.	0.6	\$325.00	\$195.00
11/25/2020	Ronald Smeberg	Review response from Mcleod counsel; email John Muller and client; conference with John Muller	0.2	\$325.00	\$65.00
11/30/2020	Paige Burough	Confer with RS; Identify state court COVID-19 operation plans; Modify hearing subpoena template; Prepare hearing subpoenas for zoom appearances	3	\$225.00	\$675.00
12/10/2020	Denielle Anguiano	Combine all time and prepare November invoice; send to R. Smeberg for review.	1.2	\$120.00	\$144.00
12/21/2020	Ronald Smeberg	Prehearing conference with John and William.	0.7	\$325.00	\$227.50
12/31/2020	Ronald Smeberg	Conference with counsel; Follow up Conference with John Muller and counsel.	0.5	\$325.00	\$162.50
1/6/2021	Ronald Smeberg	Draft motion for leave to file FFCL and Order on Motion for Leave; Email counsel.	1.5	\$325.00	\$487.50
1/7/2021	Paige Burough	Confer with RS; Conduct legal research on discovery abuse as grounds for adverse inference	2.5	\$225.00	\$562.50
1/7/2021	Ronald Smeberg	Conferences with John Muller on motions	0.4	\$325.00	\$130.00
1/8/2021	Paige Burough	Conduct legal research on disclosure protections based on allied defense doctrine, joint litigation defense, and common interest	0.8	\$225.00	\$180.00
1/8/2021	Ronald Smeberg	Review documents for Motions; conference with John Muller regarding motions; email regarding settlement.	0.7	\$325.00	\$227.50
1/27/2021	Ronald Smeberg	Draft motion to extend exclusivity.	0.6	\$325.00	\$195.00
1/28/2021	Denielle Anguiano	prepare motion to extend exclusivity and request to expedite; send to R. Smeberg for review.	1.8	\$120.00	\$216.00
1/28/2021	Denielle Anguiano	file motions and Email to clerk regarding setting.	0.3	\$120.00	\$36.00

1/28/2021	Denielle Anguiano	prepare mailout of motions and notice of hearing	0.7	\$120.00	\$84.00
2/2/2021	Denielle Anguiano	Email to clerk regarding hearing	0.1	\$120.00	\$12.00
2/3/2021	Ronald Smeberg	Attend hearing regarding extending exclusivity	0.3	\$325.00	\$97.50
3/6/2021	Denielle Anguiano	prepare Feb invoice	0.50	\$120.00	\$60.00
4/8/2021	Denielle Anguiano	prepare motion and order to extend exclusivity and request for expedited hearing	1.80	\$120.00	\$216.00
4/8/2021	Ronald Smeberg	Conference with DMA counsel on Motion to Extend Exclusivity;	0.20	\$325.00	\$65.00
4/9/2021	Denielle Anguiano	convert to PDF and file prepared motions; email to the court	0.90	\$120.00	\$108.00
4/9/2021	Denielle Anguiano	prepare notice of expedited hearing; file and mailout filed motions; take to post office. Email to counsel re expedited hearing	2.00	\$120.00	\$240.00
4/9/2021	Denielle Anguiano	email to clerk to follow up on exclusivity hearing	0.1	\$120.00	\$12.00
4/9/2021	Denielle Anguiano	email to notice parties of notice of expedited hearing	0.2	\$120.00	\$24.00
4/9/2021	Ronald Smeberg	Revise motion prepared by staff, revise order on motion; revise motion and order to expedite.	0.50	\$325.00	\$162.50
4/9/2021	Ronald Smeberg	Conference with Laura Worsham on exclusivity motion.	0.20	\$325.00	\$65.00
4/12/2021	Ronald Smeberg	Prepare for and attend exclusivity motion; email client and counsel.	0.50	\$325.00	\$162.50
6/24/2021	Ronald Smeberg	conferences with john muller and Laura Worsham	1.2	\$325.00	\$390.00
6/25/2021	Ronald Smeberg	Conferences with John Muller; review Mcleod proposal; draft counter proposal; email John Muller	1.3	\$325.00	\$422.50
6/28/2021	Ronald Smeberg	Review Muller revisions; email client and Muller; final revisions; email counsel for Mcleod	0.3	\$325.00	\$97.50
6/28/2021	Ronald Smeberg	Conference with John Muller and Larry Wright	0.7	\$325.00	\$227.50
7/2/2021	Denielle Anguiano	review of docket. Send McLeod Oil POC to R. Smeberg and J. Muller	0.2	\$120.00	\$24.00
7/6/2021	Denielle Anguiano	email to clerk requesting transcript; look up rules	0.2	\$120.00	\$24.00
7/7/2021	Ronald Smeberg	Conferences with Larry Wright, John muller, Bryan Lopez, and Laura Worsham	0.8	\$325.00	\$260.00
7/7/2021	Ronald Smeberg	Draft email to Laura Worsham	0.3	\$325.00	\$97.50
7/29/2021	Paige Burough	Confer with R. Smeberg; Prepare Order on Motion to Reset. Hearing on Disclosure Statement	0.3	\$225.00	\$67.50
8/2/2021	Paige Burough	Confer with R. Smeberg re: motion for sale of property	0.2	\$225.00	\$45.00
8/2/2021	Paige Burough	Review earnest money contract and format documents	0.5	\$225.00	\$112.50
8/2/2021	Ronald Smeberg	Review email regarding sale; email Larry Wright; conference with Larry Wright; review sales contract; conference with associate on drafting motion to sell; conference with Laura Worsham regarding motion for sale	0.8	\$325.00	\$260.00
8/3/2021	Denielle Anguiano	communications with transcriber regarding request for transcript	0.2	\$120.00	\$24.00
8/3/2021	Denielle Anguiano	prepare notice of hearing; send to R. Smeberg; minor edits; file and mailout along with motion to sell	1.5	\$120.00	\$180.00

8/3/2021	Paige Burough	Prepare v1 motion for sale of property	2	\$225.00	\$450.00
8/3/2021	Paige Burough	Prepare v1 order on motion for sale of property	1	\$225.00	\$225.00
8/4/2021	Paige Burough	Prepare motion to expedite	0.6	\$225.00	\$135.00
8/4/2021	Paige Burough	Prepare order on motion to expedite	0.3	\$225.00	\$67.50
8/4/2021	Ronald Smeberg	Work on Motion to sell free and clear	1.1	\$325.00	\$357.50
8/5/2021	Denielle Anguiano	minor revisions to order for sale; prepare exhibit and send to R. Smeberg	0.4	\$120.00	\$48.00
8/5/2021	Ronald Smeberg	Finish motion to sell free and clear and revise motion to expedite and orders;	0.7	\$325.00	\$227.50
8/5/2021	Ronald Smeberg	Conferences with John Muller and Larry Wright; conference Laura Worsham; Emails to Court regarding motion	1	\$325.00	\$325.00
8/6/2021	Ronald Smeberg	Conference with John Muller and Bryan Lopez; respond to emails from UST and Laura Worsham; conference with real estate broker.	0.5	\$325.00	\$162.50
8/10/2021	Denielle Anguiano	review and sort through all time entries for Fee Application	2.8	120	\$336.00
8/10/2021	Ronald Smeberg	Conferences with John Muller regarding settlement; conference with Laura Worsham on order; revise order	0.5	\$325.00	\$162.50
8/11/2021	Ronald Smeberg	Email parties on order; upload order; upload revised order	0.3	\$325.00	\$97.50
8/16/2021	Denielle Anguiano	Save to file transcript; issue vendor payment.	0.4	\$120.00	\$48.00
9/8/2021	Ronald Smeberg	Conferences with John Muller regarding settlement;	0.6	\$325.00	\$195.00
9/8/2021	Ronald Smeberg	Draft email to Larry Wright regarding DIP accounts	0.2	\$325.00	\$65.00
9/8/2021	Ronald Smeberg	Draft order regarding hearing.	0.5	\$325.00	\$162.50
9/13/2021	Denielle Anguiano	Finalize fee application, summary and order; send to R. Smeberg for review. Prepare envelopes for mailout.	1.8	\$120.00	\$216.00
9/13/2021	Ronald Smeberg	Prepare orders for other two cases; attempt to file the orders as directed by the Court; email court clerk.	0.4	\$325.00	\$130.00
9/20/2021	Ronald Smeberg	Conference with Larry Wright; conference with john Muller, conference with john miller and Larry Wright.	1	\$325.00	\$325.00
9/22/2021	Ronald Smeberg	Review loan docs. Draft initial objection to McLeod claim.	2.3	\$325.00	\$747.50
9/23/2021	Ronald Smeberg	Conference with Larry Wright; conference with Zeke Perez; Conference with Larry Wright; Conference with John Muller; Conference with William Germany.	0.5	\$325.00	\$162.50
9/23/2021	Ronald Smeberg	Conference with John Muller and Larry Wright	0.7	\$325.00	\$227.50
9/23/2021	Ronald Smeberg	Conferences with John Muller	0.4	\$325.00	\$130.00
9/27/2021	Ronald Smeberg	Conferences with John Muller; Research late fee issues; send research to John Muller.	1.5	\$325.00	\$487.50
9/29/2021	Denielle Anguiano	Prepare notice and certificate of service	0.7	\$120.00	\$84.00
9/29/2021	Denielle Anguiano	File and mail out notice of filing; take to post office	1	\$120.00	\$120.00
10/1/2021	Ronald Smeberg	Meet with Z. Perez and J. Muller regarding claim objection	1.2	\$325.00	\$390.00
10/13/2021	Ronald Smeberg	Conferences with John Muller; Conference with Larry Wright; conference with William Germany;	1.1	\$325.00	\$357.50

10/13/2021	Ronald Smeberg	Revise motion and order on claim objection; file motion and order with the Court.	0.5	\$325.00	\$162.50
10/13/2021	Denielle Anguiano	Draft notice of sale of ranch; send to R. Smeberg for review	0.6	\$120.00	\$72.00
10/14/2021	Paige Burough	Confer with RS re: equitable mootness and interest in real property	0.2	\$225.00	\$45.00
10/14/2021	Paige Burough	Conduct research on equitable mootness and intersections with real property interest	1	\$225.00	\$225.00
10/14/2021	Denielle Anguiano	Prepare notice of sale of ranch for filing; file and mail out	0.5	\$120.00	\$60.00
10/14/2021	Denielle Anguiano	Prepare amended certificate of service for objection; send to R. Smeberg for review and file with court. Mail out	0.5	\$120.00	\$60.00
10/27/2021	Paige Burough	Confer with R. Smeberg; Conduct and summarize research on scenarios wherein courts granted and withheld equitable mootness	3.1	\$225.00	\$697.50
10/28/2021	Paige Burough	Confer with R. Smeberg; Conduct research on losing interest at trial impairing creditor's vote	1	\$225.00	\$225.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	74.5	\$325/Hour	\$24,212.50
Ezekiel Perez	0.2	\$250/Hour	\$50.00
Craig O'Neil	19.2	\$250/Hour	\$4,800.00
Paige Burough ¹	20.5	\$225/Hour	\$4,612.50
Paige Burough	1.1	\$120/Hour	\$132.00
Denielle Anguiano	57.3	\$120/Hour	\$6,876.00
Denise Saathoff	11	\$120/Hour	\$1,320.00

<u>Disbursements</u>	<u>Amount</u>
Copies at \$0.25/page	971
Postage	\$242.75
Mileage	\$131.20
Additional Expenses	\$56.26
	\$653.24

BILLING SUMMARY

TOTAL FEES:	\$42,003.00
TOTAL DISBURSEMENTS:	\$1,083.45
TOTAL CHARGES FOR THIS BILL:	\$42,163.95

ADVERSARY ISSUES

¹ Rate and position changed for Paige Burough on May 16, 2020.

FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
4/27/2020	Craig O'Neil	Several conference calls with R. Smeberg regarding 2004 Document requests and Letter to Seger.	0.4	\$250.00	\$100.00
4/27/2020	Craig O'Neil	Phone calls with J. Muller regarding letter to Seger and substantive consolidation.	0.3	\$250.00	\$75.00
4/27/2020	Craig O'Neil	Discuss 2004 requests with R. Smeberg and obtain style of case from D. Anguiano.	0.2	\$250.00	\$50.00
4/27/2020	Craig O'Neil	Review materials and draft 2004 document request to Boerner, Dennis & Franklin, PLLC.	1.5	\$250.00	\$375.00
4/27/2020	Craig O'Neil	Review materials and draft 2004 document request to George Harrison Pigg.	0.5	\$250.00	\$125.00
4/27/2020	Craig O'Neil	Review and edit version 5 of the adversary claim.	1	\$250.00	\$250.00
4/27/2020	Ronald Smeberg	Revise 2004 Examination Notices drafted by associate; give instructions for mailing.	0.5	\$325.00	\$162.50
4/28/2020	Craig O'Neil	Review emails between D. Borders and D. Moore regarding their ownership in the Express Pipeline, and send response to R. Smeberg.	0.2	\$250.00	\$50.00
4/28/2020	Craig O'Neil	Discuss adversary claim, 2004 and 4/29 hearing with R. Smeberg.	0.1	\$250.00	\$25.00
4/28/2020	Craig O'Neil	Quick look through version 6 of adversary complaint, and provide status update email to R. Smeberg.	0.1	\$250.00	\$25.00
4/28/2020	Ezekiel Perez	Draft Rule 26 Disclosures and provide version 1 to R. Smeberg for review.	1.6	\$250.00	\$400.00
4/28/2020	Ronald Smeberg	Review and revise 2004 requests and letters regarding 2004s.	0.5	\$325.00	\$162.50
4/30/2020	Craig O'Neil	Additional research on how to respond to DMA and Long branch's motion to dismiss.	0.4	\$250.00	\$100.00
4/30/2020	Craig O'Neil	Review and edit version 8 of adversarial complaint.	0.5	\$250.00	\$125.00
4/30/2020	Ronald Smeberg	John Muller conference on "running with the land".	0.5	\$325.00	\$162.50
4/30/2020	Ronald Smeberg	Revise complaint.	1.5	\$325.00	\$487.50
5/1/2020	Craig O'Neil	Review and edit version 9 of the adversarial complaint. Send version 9 to Ron with email for review.	0.3	\$250.00	\$75.00
5/1/2020	Craig O'Neil	Research law on substantive consolidation, and single-entity law under the Texas Bus. Org. Code.	1.4	\$250.00	\$350.00
5/1/2020	Craig O'Neil	Draft response to DMA/Longbranch motion to split/dismiss.	1.5	\$250.00	\$375.00
5/1/2020	Ronald Smeberg	Review revised complaint; conference with Riverbend on investment banking services; conference with Craig O'Neil on Series issues. Conference with Larry Wright.	1	\$325.00	\$325.00
5/1/2020	Ronald Smeberg	Final Work on Complaint; contact court clerk; file complaint.	0.4	\$325.00	\$130.00
5/2/2020	Craig O'Neil	Organize outline and factors for traditional test arguments in Motion for Substantive consolidation.	0.6	\$250.00	\$150.00
5/2/2020	Craig O'Neil	Finish version 1 of motion seeking substantive consolidation.	4.5	\$250.00	\$1,125.00

5/4/2020	Denielle Anguiano	Prepare adversary complaint and summons for Certified Mailing.	0.5	\$120.00	\$60.00
5/5/2020	Denielle Anguiano	Prepare amended adversary complaint and summons for Certified Mailing.	0.4	\$120.00	\$48.00
5/5/2020	Ronald Smeberg	Conference with Don Dennis regarding 2004 and send email extending time.	0.3	\$325.00	\$97.50
5/5/2020	Ronald Smeberg	Conferences with client; conference with Michael Black; Conference with Tim Cleveland.	0.7	\$325.00	\$227.50
5/6/2020	Denielle Anguiano	Prepare amended adversary complaint and summons for Certified Mailing; take to post office.	0.5	\$120.00	\$60.00
5/7/2020	Craig O'Neil	Review emails regarding substantive consolidation and respond to R. Smeberg's email.	0.2	\$250.00	\$50.00
5/7/2020	Ronald Smeberg	Review and revise motion for substantive consolidation; email associate with questions to consider on motion; conference with client.	1	\$325.00	\$325.00
5/8/2020	Craig O'Neil	Discuss version 2 of Motion for substantive consolidation.	0.3	\$250.00	\$75.00
5/8/2020	Craig O'Neil	Draft Motion for Substantive Consolidation version 2.	1.1	\$250.00	\$275.00
5/13/2020	Craig O'Neil	Review 2004 request emails between R. Smeberg and opposing counsel.	0.1	\$250.00	\$25.00
5/13/2020	Denielle Anguiano	Prepare for mail out of amended response and take to the post office.	0.7	\$120.00	\$84.00
5/13/2020	Ronald Smeberg	Make changes to motion to dismiss amended response and send to associate.	0.3	\$325.00	\$97.50
5/19/2020	Craig O'Neil	Discuss opposing counsels reply and fraudulent transfer argument for KrisJenn and Pipeline Row for the Express Pipeline.	0.3	\$250.00	\$75.00
5/20/2020	Craig O'Neil	Review Longbranch and DMA's reply in motion to sever/dismiss, and outline counter-arguments.	1.2	\$250.00	\$300.00
5/20/2020	Craig O'Neil	Discuss Longbranch and DMA reply to our response with R. Smeberg.	0.2	\$250.00	\$50.00
5/26/2020	Craig O'Neil	Discuss adversarial complaint discovery with J. Muller.	0.1	\$250.00	\$25.00
5/26/2020	Denielle Anguiano	Prepare certificate of service for summons; scan and save Certified Return Receipts.	0.2	\$120.00	\$24.00
5/27/2020	Craig O'Neil	Discuss transcript and adversarial complaint strategy with R. Smeberg.	0.1	\$250.00	\$25.00
5/27/2020	Denielle Anguiano	Confer with R. Smeberg; revise certificate of service for summons.	0.2	\$120.00	\$24.00
5/28/2020	Craig O'Neil	Relay case status to J. Muller.	0.2	\$250.00	\$50.00
6/3/2020	Craig O'Neil	Discuss answer to adversary counterclaim and discovery with R. Smeberg.	0.1	\$250.00	\$25.00
6/5/2020	Ronald Smeberg	Draft initial discovery to Defendants in adversary.	2.2	\$325.00	\$715.00
6/5/2020	Ronald Smeberg	Email Larry Wright information on the litigation; email exhibits to Larry Wright.	0.4	\$325.00	\$130.00
6/19/2020	Ezekiel Perez	Confer with J. Muller and C. O'Neil regarding draft of answer in case; begin draft of version 1 of Debtors' Answer.	3.1	\$250.00	\$775.00
6/21/2020	Craig O'Neil	Version 2 of the counterclaim answer.	1	\$250.00	\$250.00

6/21/2020	Ezekiel Perez	Confer with C. O'Neil; draft version 1 of answer; send to C. O'Neil for review.	2.1	\$250.00	\$525.00
6/22/2020	Craig O'Neil	Review emails from R. Smeberg regarding continuance to answer.	0.2	\$250.00	\$50.00
6/22/2020	Ezekiel Perez	Draft motion and order to extend time to respond to adversary.	0.5	\$250.00	\$125.00
6/22/2020	Ronald Smeberg	Conference with client regarding answer to counterclaim.	2	\$325.00	\$650.00
6/24/2020	Ronald Smeberg	Draft and file statement of consent; email comments regarding answer to associates and J. Muller.	0.5	\$325.00	\$162.50
6/28/2020	Ezekiel Perez	Review and edit version 2 of Answer to Counterclaim; confer with R. Smeberg regarding the same.	0.4	\$250.00	\$100.00
6/29/2020	Craig O'Neil	Discussing answer to second counter claim with E. Perez.	0.1	\$250.00	\$25.00
6/29/2020	Denielle Anguiano	Review of adversary docket; confer with R. Smeberg regarding additional complaint; email to Z. Perez regarding the same. Draft and attach certificate of service and file.	1.2	\$120.00	\$144.00
6/29/2020	Ezekiel Perez	Review pleadings and edit final draft of answer; confer with R. Smeberg; send proposed final draft to R. Smeberg for review; Confer with C. O'Neil regarding draft Answer to second counterclaim and provide outlined response; confer with D. Anguiano regarding filing and J. Muller regarding last review.	2.9	\$250.00	\$725.00
6/30/2020	Craig O'Neil	Drafting Answer to Moore's counterclaim.	3.5	\$250.00	\$875.00
6/30/2020	Craig O'Neil	Conference call regarding litigation strategy on adversary complaint and counterclaim.	1.8	\$250.00	\$450.00
6/30/2020	Craig O'Neil	Discussing implications of state MSJ on BR MSJ with J. Muller.	0.3	\$250.00	\$75.00
6/30/2020	Craig O'Neil	Email to legal team regarding implications of state MSJ on BR MSJ.	0.1	\$250.00	\$25.00
6/30/2020	Ezekiel Perez	Review version 1 of answer to counterclaim; teleconference with client, J. Muller, R. Smeberg, and C. O'Neil regarding case status and third party subpoenas.	2.1	\$250.00	\$525.00
7/3/2020	Craig O'Neil	Update E. Perez on answer deadline.	0.1	\$250.00	\$25.00
7/3/2020	Craig O'Neil	Call to J. Muller regarding answer to Moore's counterclaim. Leave a voicemail.	0.1	\$250.00	\$25.00
7/3/2020	Ezekiel Perez	Review & edit version 1 of counterclaim answer and confer with C. O'Neil regarding filing.	0.4	\$250.00	\$100.00
7/5/2020	Craig O'Neil	Send answer to Moore's counterclaim to J. Muller for review; provide status update.	0.2	\$250.00	\$50.00
7/6/2020	Craig O'Neil	Finalize answer to Moore's counterclaims and discuss with R. Smeberg and J. Muller. Task D. Anguiano with certificate of service and file.	1.1	\$250.00	\$275.00
7/6/2020	Denielle Anguiano	Call with C. O'Neil regarding answer; confer with J. Muller regarding the same. Add certificate of service to Answer and file.	0.3	\$120.00	\$36.00

7/6/2020	Denielle Anguiano	Call with J. Muller and S. Barnash regarding David Strolle subpoena.	0.2	\$120.00	\$24.00
7/6/2020	Ezekiel Perez	Confer with C. O'Neil regarding proposed draft of answer and filing; confer with J. Muller regarding motion to quash and objections to subpoena.	0.2	\$250.00	\$50.00
7/7/2020	Ezekiel Perez	Draft version 1 of motion to quash and objections.	2.4	\$250.00	\$600.00
8/6/2020	Ronald Smeberg	Review new settlement LOI	0.7	\$325.00	\$227.50
8/6/2020	Ronald Smeberg	Draft email to Debtor regarding LOI.	0.3	\$325.00	\$97.50
8/12/2020	Ronald Smeberg	Conference with Tim Cleveland; email exchange with John Muller.	0.6	\$325.00	\$195.00
8/17/2020	Ronald Smeberg	Conference with counsel for McLeod; email adversary team and Debtor regarding McLeod.	0.9	\$325.00	\$292.50
8/17/2020	Ronald Smeberg	Case Strategy Conferences with John Muller.	0.5	\$325.00	\$162.50
8/18/2020	Ronald Smeberg	Conference with Larry Wright and William Germany.	0.2	\$325.00	\$65.00
8/18/2020	Ronald Smeberg	Conference with Larry Wright William Germany and McLeod Counsel.	0.9	\$325.00	\$292.50
8/18/2020	Ronald Smeberg	Conference with Larry Wright and William Germany.	0.4	\$325.00	\$130.00
8/19/2020	Ronald Smeberg	Conferences with William Kulman on potential settlements.	0.5	\$325.00	\$162.50
8/19/2020	Ronald Smeberg	Conference with Jeff Duke on settlement.	0.2	\$325.00	\$65.00
8/24/2020	Ronald Smeberg	Review settlement docs; draft comments; email litigation team.	1.5	\$325.00	\$487.50
8/27/2020	Ronald Smeberg	Conference with Larry Wright and John Muller regarding litigation.	0.8	\$325.00	\$260.00
8/27/2020	Ronald Smeberg	Continued conference with Larry Wright a regarding litigation.	0.7	\$325.00	\$227.50
9/2/2020	Ronald Smeberg	Conference with Jeff Duke: conference with Larry Wright regarding new settlement discussions.	0.3	\$325.00	\$97.50
9/8/2020	Ronald Smeberg	Conference with Jeff Duke regarding settlement and revise agreement.	0.3	\$325.00	\$97.50
9/8/2020	Ronald Smeberg	Conferences with John Muller and Natalie Wilson on discovery issues. Draft follow up email to Natalie Wilson regarding the same.	0.7	\$325.00	\$227.50
9/8/2020	Ronald Smeberg	Conference with John Muller regarding agreement; email to Jeff Duke regarding the same.	0.2	\$325.00	\$65.00
9/9/2020	Ronald Smeberg	Email Larry Wright regarding DMA issues	0.1	\$325.00	\$32.50
9/9/2020	Ronald Smeberg	Bill Kulman conference; Michael Black conference on settlement; Larry Wright conference on settlement.	0.4	\$325.00	\$130.00
9/9/2020	Ronald Smeberg	Conference with John Muller on settlement; conference with Bryan Lopez on settlement; text status to Jeff Duke; Conference with Larry Wright.	0.4	\$325.00	\$130.00
9/9/2020	Ronald Smeberg	Review litigation counsel changes to agreement.	0.3	\$325.00	\$97.50
9/9/2020	Ronald Smeberg	Conference with Bryan Lopez on settlement agreement; conference with Jeff Duke on settlement agreement.	0.5	\$325.00	\$162.50
9/9/2020	Ronald Smeberg	Revisions to settlement agreement.	0.8	\$325.00	\$260.00
9/11/2020	Ronald Smeberg	Meeting with Larry Wright regarding settlement; Follow up conference call with Larry Wright.	1	\$325.00	\$325.00

9/11/2020	Ronald Smeberg	Several conferences with Michael Black.	0.5	\$325.00	\$162.50
9/11/2020	Ronald Smeberg	Settlement meeting with Michael Black at Black's office.	6	\$325.00	\$1,950.00
9/11/2020	Ronald Smeberg	Conference with client; conference with John Muller.	0.4	\$325.00	\$130.00
9/14/2020	Ronald Smeberg	Conferences with Michael Black; conference with Michael Black and John Muller.	0.6	\$325.00	\$195.00
10/9/2020	Ronald Smeberg	Attend John Mcleod deposition.	3	\$325.00	\$975.00
11/2/2020	Denielle Anguiano	File amended compliant with court	0.3	\$120.00	\$36.00
11/3/2020	Denielle Anguiano	Review and file second amended complaint	0.4	\$120.00	\$48.00
11/18/2020	Denielle Anguiano	Confer with Z. Perez and file answer and affirmative defenses	0.2	\$120.00	\$24.00
12/10/2020	Ronald Smeberg	Conference with John Muller regarding KrisJenn case issues discussing how to process settlement in bankruptcy procedure; settlement conference with John Muller and William Kulman regarding bankruptcy settlement procedure.	1.2	\$325.00	\$390.00
12/22/2020	Ronald Smeberg	Attend discovery hearing.	1	\$325.00	\$325.00
12/22/2020	Ronald Smeberg	John Muller Conference.	0.2	\$325.00	\$65.00
1/6/2021	Ronald Smeberg	Conferences with John Muller and William Germany regarding FFCL; attend phone conference with opposing counsel.	0.6	\$325.00	\$195.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	38.5	\$325/Hour	\$12,512.50
Ezekiel Perez	15.7	\$250/Hour	\$3,925.00
Craig O'Neil	25.9	\$250/Hour	\$6,475.00
Denielle Anguiano	5.1	\$120/Hour	\$612.00

<u>Disbursements</u>	<u>Amount</u>
Copies at \$0.25/page	\$9.00
Postage	\$19.80
Mileage	\$6.96
Filing Fee	\$350.00

BILLING SUMMARY

TOTAL FEES:	\$23,524.50
TOTAL DISBURSEMENTS:	\$385.76
TOTAL CHARGES FOR THIS BILL:	\$23,910.26

CASH COLLATERAL
FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
6/29/2020	Denielle Anguiano	Revisions to Cash Collateral order; send to R. Smeberg.	0.3	\$120.00	\$36.00
6/30/2020	Ronald Smeberg	Draft second interim cash collateral order and email McCleod counsel.	0.5	\$325.00	\$162.50
7/1/2020	Ronald Smeberg	Client conference; prepare for and attend cash collateral hearing.	0.3	\$325.00	\$97.50
9/1/2020	Ronald Smeberg	Conference with counsel for Mcleod regarding cash collateral hearing; email court deputy; review order3	0.3	\$325.00	\$97.50
9/2/2020	Ronald Smeberg	Prepare for and attend cash collateral hearing.	0.2	\$325.00	\$65.00
11/25/2020	Ronald Smeberg	Conferences with John Muller; conference with associate regarding cash collateral agreement.	0.5	\$325.00	\$162.50
11/27/2020	Ronald Smeberg	Work on motion to modify cash collateral order	0.7	\$325.00	\$227.50
11/30/2020	Paige Burough	Prepare motion to modify cash collateral order shell	0.8	\$225.00	\$180.00
12/1/2020	Ronald Smeberg	Finish first draft of Motion to Modify Cash Collateral order; begin working on order; email to Mcleod counsel	1.5	\$325.00	\$487.50
12/2/2020	Ronald Smeberg	Finish first draft of Order on motion to modify. Email to Mcleod counsel.	0.8	\$325.00	\$260.00
12/3/2020	Ronald Smeberg	review Laura Worsham changes to order; email back comments; conference with Laura Worsham.	0.5	\$325.00	\$162.50
12/4/2020	Denielle Anguiano	revisions on Motion to Modify and Cash Collateral with R. Smeberg; prepare for filing; file and mailout	2.4	\$120.00	\$288.00
12/4/2020	Paige Burough	Prepare motion and order to expedite motion to modify cash collateral order	1	\$225.00	\$225.00
12/4/2020	Ronald Smeberg	Review changes to order from Laura Worsham; email exchanges; conference with staff regarding motion to expedite; email client regarding final drafts.	0.7	\$325.00	\$227.50
12/7/2020	Denielle Anguiano	Email to clerk for hearing date.	0.2	\$120.00	\$24.00
12/7/2020	Denielle Anguiano	prepare notice of hearing; send to R. Smeberg for review; file and mail out	0.8	\$120.00	\$96.00
12/9/2020	Ronald Smeberg	Conference with Laura Worsham regarding Cash Collateral Hearing; prepare for and attend hearing; conference with Laura Worsham.	0.7	\$325.00	\$227.50
1/27/2021	Ronald Smeberg	Review KrisJenn orders on cash collateral and exclusivity; email exchanges with counsels regarding motions; review prior final cash collateral order; email court deputy; conference with Laura Worsham.	0.8	\$325.00	\$260.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	7.5	\$325/Hour	\$2,437.50
Paige Burough	1.8	\$225/Hour	\$405.00
Denielle Anguiano	3.7	\$120/Hour	\$444.00

Disbursements

Amount

Copies at \$0.25/page	54	\$13.50
Postage		\$19.80

BILLING SUMMARY

TOTAL FEES:	\$3,286.50
TOTAL DISBURSEMENTS:	\$33.30
TOTAL CHARGES FOR THIS BILL:	\$3,319.80

MOTIONS TO EMPLOY PROFESSIONALS FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
5/29/2020	Denielle Anguiano	Confer with R. Smeberg regarding motion to employ accountant; email to P. Burough regarding the same. Assist D. Saathoff with scan of tax returns.	0.5	\$120.00	\$60.00
5/29/2020	Ronald Smeberg	Meet with client at the office; conference with client accountant.	1.5	\$325.00	\$487.50
6/1/2020	Paige Burough	Prepare Motion to Employ Accountant Nunc Pro Tunc, Accountant's Affidavit, and Proposed Order.	1.8	\$120.00	\$216.00
6/1/2020	Paige Burough	Confer with R. Smeberg; Prepare motion to employ accountant Nunc pro Tunc, order, and declaration.	1.2	\$120.00	\$144.00
6/4/2020	Paige Burough	Contact proposed accountant regarding exhibits to motion to employ; Email follow up with declaration.	0.5	\$120.00	\$60.00
6/4/2020	Ronald Smeberg	Review and revise application to employ accountant.	0.3	\$325.00	\$97.50
6/9/2020	Denielle Anguiano	Confer with P. Burough regarding filing of motion to employ accountant; discuss supplement and affidavit; locate and send supplement.	0.3	\$120.00	\$36.00
8/10/2020	Ronald Smeberg	Conference with staff on new accountant agreement; Email to UST regarding new accountant.	0.3	\$325.00	\$97.50
8/13/2020	Denielle Anguiano	Prepare motion and order to employ accountant; send to R. Smeberg for review.	0.7	\$120.00	\$84.00
8/25/2020	Denielle Anguiano	Minor revisions to motion and order to employ accountant.	0.4	\$120.00	\$48.00
9/2/2020	Ronald Smeberg	Draft affidavit for new accountant and email to accountant	0.5	\$325.00	\$162.50
9/2/2020	Ronald Smeberg	Revise order on motion to employ and edit motion further; email staff regarding filing.	0.3	\$325.00	\$97.50
9/2/2020	Ronald Smeberg	Review motion to employ new accountant.	0.3	\$325.00	\$97.50
9/3/2020	Denielle Anguiano	Minor revisions to motion to employ accountant; format exhibits and file. Prepare for mail out.	0.9	\$120.00	\$108.00
7/6/2021	Denielle Anguiano	prepare motion to employ broker and send to R. Smeberg for review; edits to declaration	1.2	\$120.00	\$144.00
7/7/2021	Denielle Anguiano	begin draft of mtn to employ broker	1	\$120.00	\$120.00

7/8/2021	Denielle Anguiano	finalize motion, order and declaration to employ broker; send to R. Smeberg for review	1	\$120.00	\$120.00
7/9/2021	Denielle Anguiano	Prepare mailout of motion to employ; take to post.	1	\$120.00	\$120.00
7/9/2021	Ronald Smeberg	Review and revise motion and order to employ broker and file with the Court.	0.6	\$325.00	\$195.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	3.8	\$325/Hour	\$1,235.00
Paige Burough	3.5	\$120/Hour	\$420.00
Denielle Anguiano	7	\$120/Hour	\$840.00

<u>Disbursements</u>	<u>Amount</u>
Copies at \$0.25/page	\$13.50
Postage	\$9.90
Mileage	\$6.96

BILLING SUMMARY

TOTAL FEES:	\$2,495.00
TOTAL DISBURSEMENTS:	\$30.36
TOTAL CHARGES FOR THIS BILL:	\$2,525.36

SCHEDULES, STATEMENTS AND INITIAL DEBTOR'S CONFERENCE FOR PROFESSIONAL SERVICES RENDERED

<u>DATE</u>	<u>USER</u>	<u>DESCRIPTION</u>	<u>TIME</u>	<u>RATE</u>	<u>AMOUNT OWED</u>
4/29/2020	Ronald Smeberg	Meet with Larry Wright and revise documents; revise schedule A and cover with Larry Wright.	0.8	\$325.00	\$260.00
5/4/2020	Denielle Anguiano	Work on IDC.	0.6	\$120.00	\$72.00
5/6/2020	Denielle Anguiano	Finish IDC; call with client and send to Ron for review.	0.5	\$120.00	\$60.00
5/6/2020	Denielle Anguiano	Phone call with client and State Farm representative regarding IDC insurance exhibit.	0.2	\$120.00	\$24.00
5/16/2020	Ronald Smeberg	Conference with client advising of need for appraisals for all secured property; conferences with staff on preparing for hearing; email exchange with opposing counsel.	0.6	\$325.00	\$195.00
5/19/2020	Ronald Smeberg	Client conference; discuss opening and closing with Craig O'Neil; review IDC docs; amend IDC docs; emails to the UST office.	0.6	\$325.00	\$195.00
5/21/2020	Ronald Smeberg	Prepare for and attend IDC with Larry Wright.	0.6	\$325.00	\$195.00
5/31/2020	Denielle Anguiano	Confer with R. Smeberg; attention to 2019 entity taxes; redact and save.	0.8	\$120.00	\$96.00

5/31/2020	Ronald Smeberg	Work on schedules; email UST.	1.2	\$325.00	\$390.00
6/1/2020	Denielle Anguiano	Confer with R. Smeberg regarding moved 341; draft notice; file and mail out; take to post office.	0.9	\$120.00	\$108.00
6/4/2020	Denielle Anguiano	Attention to tax return; split in two parts and send to US Trustee.	0.3	\$120.00	\$36.00
6/4/2020	Ronald Smeberg	Further work on schedules; email client; make additional changes to schedules and email client.	0.4	\$325.00	\$130.00
6/4/2020	Ronald Smeberg	Client conference, revise schedules, email to client.	0.2	\$325.00	\$65.00
6/5/2020	Denielle Anguiano	Mail out of amended schedules	0.8	\$120.00	\$96.00
6/8/2020	Ronald Smeberg	Conferences with Larry Wright prior to 341 meeting.	0.5	\$325.00	\$162.50
6/8/2020	Ronald Smeberg	Attend IDC Conference with Debtor's representative.	1.5	\$325.00	\$487.50
6/15/2020	Paige Burough	Confer with R. Smeberg; Prepare joint order and master service list notices.	2	\$120.00	\$240.00
6/18/2020	Denielle Anguiano	Search DOJ site for 341 CD request form; send email.	0.4	\$120.00	\$48.00
6/19/2020	Ronald Smeberg	Revise both series petitions and schedules prepared by staff; email exchanges with client; file petitions and schedules with the Court.	1.4	\$325.00	\$455.00
7/1/2020	Denielle Anguiano	Prepare IDC checklist for 2 additional filings; send to client. Review docket for schedule filings and send to debtor.	1.2	\$120.00	\$144.00
7/2/2020	Denielle Anguiano	Email to debtor regarding IDC documents and 341 meetings.	0.3	\$120.00	\$36.00
7/2/2020	Ronald Smeberg	Review and revise IDC docs for series. Email to client. Email to UST.	0.4	\$325.00	\$130.00
7/2/2020	Ronald Smeberg	Attend KrisJenn IDC	0.7	\$325.00	\$227.50
7/13/2020	Ronald Smeberg	Attend 341 meetings with Corporate Representative for Series ROW and Series Uvalde Ranch.	2	\$325.00	\$650.00
8/27/2020	Craig O'Neil	Review email regarding whether option to purchase real property is an executory contract.	0.1	\$250.00	\$25.00
8/28/2020	Craig O'Neil	Legal Research on executory contracts.	1.2	\$250.00	\$300.00
8/28/2020	Craig O'Neil	Discuss preliminary executory contracts with R. Smeberg.	0.4	\$250.00	\$100.00
8/28/2020	Ronald Smeberg	Conference with associate regarding research on options as executory contracts.	0.4	\$325.00	\$130.00
8/31/2020	Craig O'Neil	Research option as an executory contract.	1	\$250.00	\$250.00
12/11/2020	Denielle Anguiano	Send creditor matrix to counsel in adversarial matter	0.2	\$120.00	\$24.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	11.3	\$325/Hour	\$3,672.50
Craig O'Neil	2.7	\$250/Hour	\$675.00
Paige Burough	2	\$120/Hour	\$240.00
Denielle Anguiano	6.2	\$120/Hour	\$744.00

<u>Disbursements</u>		<u>Amount</u>
Copies at \$0.25/page	127	\$31.75
Postage		\$23.65
Mileage		\$2.32

BILLING SUMMARY

TOTAL FEES:	\$5,331.50
TOTAL DISBURSEMENTS:	\$57.72
TOTAL CHARGES FOR THIS BILL:	\$5,389.22

MONTHLY OPERATING REPORTS FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
6/12/2020	Denielle Anguiano	Discuss with R. Smeberg debtor's MOR; partially complete May MOR and send to J. Mires.	0.4	\$120.00	\$48.00
6/30/2020	Denielle Anguiano	Email to Mires and debtor regarding May MOR; review, revise and redact; file.	1	\$120.00	\$120.00
6/30/2020	Ronald Smeberg	Contact accountant; review MOR; conference with McCleod counsel	0.4	\$325.00	\$130.00
7/27/2020	Denielle Anguiano	Review, format, save and redact bank statement for June MOR	0.4	\$120.00	\$48.00
7/27/2020	Denielle Anguiano	Review of June MOR; text exchange with debtor and email follow up.	0.3	\$120.00	\$36.00
8/10/2020	Ronald Smeberg	Review MOR from June; review new accountant engagement letter and email to now accountant.	0.2	\$325.00	\$65.00
8/13/2020	Denielle Anguiano	Save Jpeg files and convert to PDF	0.3	\$120.00	\$36.00
8/27/2020	Denielle Anguiano	Prepare MOR for signature; scan and attached to PDF; rotate and redact pages.	0.4	\$120.00	\$48.00
8/28/2020	Denielle Anguiano	Review and file July MOR.	0.3	\$120.00	\$36.00
9/14/2020	Denielle Anguiano	Review of MOR with debtor and obtain signature. Scan and save to file.	0.2	\$120.00	\$24.00
9/21/2020	Denielle Anguiano	Redact and file Aug MOR	0.3	\$120.00	\$36.00
10/21/2020	Denielle Anguiano	Call with L. Wright to arrange for MOR signature; prepare for filing; request bank statements.	0.5	\$120.00	\$60.00
10/22/2020	Denielle Anguiano	File September MOR	0.1	\$120.00	\$12.00
11/23/2020	Denielle Anguiano	Emails with debtor regarding report of operations; redact bank statements and file.	1.4	\$120.00	\$168.00
12/23/2020	Denielle Anguiano	Email to CPA to request November MOR	0.2	\$120.00	\$24.00
12/28/2020	Denielle Anguiano	Email to CPA to follow up on November MOR	0.1	\$120.00	\$12.00
12/30/2020	Denielle Anguiano	Email to CPA for November MOR; email exchanges with Debtor regarding the same; prepare MOR for filing	1	\$120.00	\$120.00

1/4/2021	Denielle Anguiano	email to debtor regarding November MOR; prepare to file	0.4	\$120.00	\$48.00
1/11/2021	Denielle Anguiano	prepare invoice and Nov MOR for filing; send to R. Smeberg for review	0.7	\$120.00	\$84.00
1/21/2021	Denielle Anguiano	Email to accountant regarding December MOR	0.1	\$120.00	\$12.00
1/24/2021	Denielle Anguiano	review of December MOR	0.2	\$120.00	\$24.00
2/25/2021	Denielle Anguiano	review of January MOR sent by Debtor and reformat for filing	0.5	\$120.00	\$60.00
2/26/2021	Denielle Anguiano	save and redact bank statements; email to debtor regarding January MOR	1.5	\$120.00	\$180.00
3/1/2021	Denielle Anguiano	email to accountant for MOR	0.1	\$120.00	\$12.00
3/10/2021	Denielle Anguiano	follow up email to accountant for MOR attachments; redact and combine Jan MOR; email to debtor requesting review and signature of the same	0.6	\$120.00	\$72.00
3/17/2021	Denielle Anguiano	redact combine bank statements to MOR; send to debtor for review	0.5	\$120.00	\$60.00
3/19/2021	Denielle Anguiano	email correspondence with accountant regarding Feb MOR	0.3	\$120.00	\$36.00
3/19/2021	Denielle Anguiano	convert signature pages to PDF and prepare December and January MORs for filing; file	1.3	\$120.00	\$156.00
3/22/2021	Denielle Anguiano	follow up email to accountant regarding MOR	0.1	\$120.00	\$12.00
3/22/2021	Denielle Anguiano	combine and redact Feb MOR; send to debtor for review and signature	0.5	\$120.00	\$60.00
3/25/2021	Denielle Anguiano	prepare FEB MOR for filing; file	0.3	\$120.00	\$36.00
4/27/2021	Denielle Anguiano	email to accountant requesting March MOR	0.1	\$120.00	\$12.00
5/5/2021	Denielle Anguiano	Receive bank statement from debtor; download and save to file.	0.2	\$120.00	\$24.00
5/7/2021	Denielle Anguiano	follow up email to accountant regarding MOR	0.2	\$120.00	\$24.00
5/7/2021	Denielle Anguiano	combine and redact March MOR; send to debtor for review and signature	1	\$120.00	\$120.00
5/19/2021	Denielle Anguiano	email to accountant requesting April MOR	0.1	\$120.00	\$12.00
5/19/2021	Denielle Anguiano	convert and redact April bank statement; email to accountant	0.5	\$120.00	\$60.00
5/19/2021	Denielle Anguiano	combine signature page for March MOR; prepare for filing	0.5	\$120.00	\$60.00
6/1/2021	Denielle Anguiano	email to accountant requesting April MOR	0.1	\$120.00	\$12.00
6/3/2021	Denielle Anguiano	combine and redact April MOR; send to debtor for review and execution	0.7	\$120.00	\$84.00
6/3/2021	Denielle Anguiano	file March MOR	0.2	\$120.00	\$24.00
6/7/2021	Denielle Anguiano	email to debtor for signature request	0.1	\$120.00	\$12.00
6/8/2021	Denielle Anguiano	convert signature page to PDF and file April MOR	0.5	\$120.00	\$60.00
7/19/2021	Denielle Anguiano	email to L. Wright and accountant for follow up to June MOR	0.2	\$120.00	\$24.00
7/19/2021	Denielle Anguiano	prepare May MOR for filing and file	0.7	\$120.00	\$84.00
7/20/2021	Denielle Anguiano	email to accountant for June MOR	0.1	\$120.00	\$12.00

7/20/2021	Denielle Anguiano	combine and redact June MOR; send to client for review and signature	0.5	\$120.00	\$60.00
7/21/2021	Denielle Anguiano	send signed MOR to R. Smeberg for review	0.1	\$120.00	\$12.00
7/22/2021	Denielle Anguiano	prepare June MOR for filing and file	0.5	\$120.00	\$60.00
9/28/2021	Denielle Anguiano	review and send MOR to L. Wright for execution; follow up with text	0.5	\$120.00	\$60.00
10/11/2021	Denielle Anguiano	further redact MOR; convert signature pages to PDF and file July and August MOR	0.4	\$120.00	\$48.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	0.6	\$325/Hour	\$195.00
Denielle Anguiano	21.2	\$120/Hour	\$2,544.00

BILLING SUMMARY

TOTAL FEES:	\$2,739.00
TOTAL DISBURSEMENTS:	\$0.00
TOTAL CHARGES FOR THIS BILL:	\$2,739.00

PLAN AND DISCLOSURE STATEMENT FOR PROFESSIONAL SERVICES RENDERED

DATE	USER	DESCRIPTION	TIME	RATE	AMOUNT OWED
6/26/2021	Paige Burough	Confer with R. Smeberg; Review draft bankruptcy plans and disclosure statement; Draft background for inclusion in plans and disclosure statement	1.8	\$225.00	\$405.00
7/3/2021	Paige Burough	Confer with R. Smeberg; Prepare v1 disclosure statement	1.4	\$225.00	\$315.00
7/3/2021	Paige Burough	Prepare v1 plan for KrisJenn Ranch, KrisJenn Uvalde ranch, and KrisJenn Row	1.8	\$225.00	\$405.00
7/5/2021	Paige Burough	Continue discourse statement and plan preparation	2.5	\$225.00	\$562.50
7/6/2021	Ronald Smeberg	Work on KrisJenn joint disclosure statement	3.5	\$325.00	\$1,137.50
7/7/2021	Ronald Smeberg	Work on disclosure statement	3.5	\$325.00	\$1,137.50
7/7/2021	Ronald Smeberg	Email staff instructions for editing disclosure statement	0.2	\$325.00	\$65.00
7/8/2021	Paige Burough	Review R. Smeberg revisions; Prepare v3 disclosure statement	1.6	\$225.00	\$360.00
7/8/2021	Paige Burough	Review R. Smeberg revisions; Prepare consolidated plan	2.3	\$225.00	\$517.50
7/9/2021	Ronald Smeberg	Work on Disclosures Statement	1.7	\$325.00	\$552.50
7/12/2021	Denielle Anguiano	confer with P. Burough regarding case status and strategy for Plan	0.2	\$120.00	\$24.00
7/12/2021	Denielle Anguiano	prepare Plan and Disclosure Statement for filing	0.5	\$120.00	\$60.00

7/12/2021	Ronald Smeberg	Conference with John Muller and Larry Wright; conference with staff regarding plan and disclosure statement; final changes to plan; file plan and disclosure statement	0.7	\$325.00	\$227.50
7/12/2021	Ronald Smeberg	work on plan and disclosure statement	2.1	\$325.00	\$682.50
7/16/2021	Denielle Anguiano	edit captions on plans; format as necessary and send to R. Smeberg for review	0.8	120	\$96.00
7/16/2021	Denielle Anguiano	amendments to plan and disclosure statements of each debtor; reformat and prepare for filing	2.3	\$120.00	\$276.00
7/19/2021	Denielle Anguiano	file amended plans and disclosure statement in each case	0.7	\$120.00	\$84.00
7/20/2021	Denielle Anguiano	discuss with R. Smeberg plan amendment; email changes to Laura Worsham	0.3	\$120.00	\$36.00
7/29/2021	Paige Burough	Confer with R. Smeberg; Prepare Motion to Reset. Hearing on Disclosure Statement	0.8	\$225.00	\$180.00
7/29/2021	Ronald Smeberg	Review and revise motion to continue disclosure statement hearing; email Laura Worsham; email exchange with Larry Wright. .	0.7	\$325.00	\$227.50
9/7/2021	Ronald Smeberg	Conferences with John Muller and Laura Worsham regarding disclosure hearing; draft email confirming agreements on disclosure hearing; email court Deputy regarding hearing.	0.5	\$325.00	\$162.50
9/8/2021	Ronald Smeberg	Prepare and travel to in-person disclosure hearing; travel back to office	1.9	\$325.00	\$617.50
9/13/2021	Ronald Smeberg	Prepare orders for other two cases; attempt to file the orders as directed by the Court; email court clerk.	0.4	\$325.00	\$130.00
9/20/2021	Ronald Smeberg	Work on second amended plan	0.7	\$325.00	\$227.50
9/23/2021	Ronald Smeberg	Work on second amended plan	2.5	\$325.00	\$812.50
9/23/2021	Ronald Smeberg	Further work on plan.	1.2	\$325.00	\$390.00
9/24/2021	Ronald Smeberg	Further work on plan; amend disclosure statement	1.5	\$325.00	\$487.50
9/26/2021	Ronald Smeberg	Further work on amended disclosure statement and email client.	0.4	\$325.00	\$130.00
9/28/2021	Ronald Smeberg	Finalize plan and disclosure statement; work with staff on preparing for filing; file three plans and three disclosure statements.	0.9	\$325.00	\$292.50
9/28/2021	Denielle Anguiano	Review and format disclosure statement and plan for 3 cases; prepare for filing. Send to R. Smeberg.	2	\$120.00	\$240.00
10/13/2021	Ronald Smeberg	Prepare for and attend disclosure hearing; conference with Natalie Wilson at court house; return to office.	1.3	\$325.00	\$422.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ronald Smeberg	23.7	\$325/Hour	\$7,702.50
Paige Burough	12.2	\$225/Hour	\$2,745.00
Denielle Anguiano	6.8	\$120/Hour	\$816.00

Disbursements

Filing Fee

Amount

\$188.00

BILLING SUMMARY

TOTAL FEES:	\$11,263.50
TOTAL DISBURSEMENTS:	\$188.00
TOTAL CHARGES FOR THIS BILL:	\$11,451.50

SERVICE LIST

DEBTOR

KrissJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

**GOVERNMENT
ENTITIES**

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-
1539

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite
600
San Antonio, Texas 78216

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026
AUS
Austin, TX 78701

Texas Comptroller of
Public Account
Attn: Bankruptcy

P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax
Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas
75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax
Collector
200 St. Augustine St.
Center, Texas 75935

Tenaha ISD Tax Assessor-
Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
Courthouse Plaza, Box 8

Uvalde, Texas 78801

NOTICE PARTIES

METTAUER LAW FIRM
c/o April Prince
403 Nacogdoches St Ste 1
Center, TX 75935-3810

Albert, Neely & Kuhlmann
1600 Oil & Gas Building
309 W 7th St
Fort Worth, TX 76102-
6900

Laura L. Worsham
JONES, ALLEN &
FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Craig Crockett
CRAIG M. CROCKETT, PC
5201 Camp Bowie Blvd.
#200
Fort Worth, Texas 76107

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ste 400A
Austin, Texas 78737

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CLEVELAND/TERRAZA
S PLLC
4611 Bee Cave Road, ste
306B
Austin, Texas 78746

Andrew R. Seger
KEY TERRELL &
SEGER
4825 50th Street, ste A
Lubbock, Texas 79414

**SECURED
CREIDITORS**

McLeod Oil, LLC
c/o John W. McLeod, Jr.
700 N Wildwood Dr
Irving, TX 75061-8832

**UNSECURED
CREIDITORS**

Bigfoot Energy Services
312 W Sabine St

Carthage, TX 75633-2519

C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste
500
San Antonio, TX 78212-
3135

Granstaff Gaedke &
Edgmon
5535 Fredericksburg Rd
Ste 110
San Antonio, TX 78229-
3553

Hopper's Soft Water
Service
120 W Frio St
Uvalde, TX 78801-3602

Larry Wright
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

Medina Electric

2308 18th St.
Po Box 370
Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER
RICHMOND
Po Box 175
Fulshear, TX 77441-0175

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896 Walnut Street at US
123 BYP
Seneca, SC 29678